

May 14, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket # 98N-1038, Irradiation in the Production, Processing and Handling of Food.

To Whom It May Concern:

The FDA should retain the current labeling law, the current terminology of "treated with radiation" or "treated by irradiation", and the use of the radura symbol on all irradiated foods.

Regarding the issue of labeling, in its initial petition, the FDA concluded that irradiation was a "material fact" about the processing of a food and thus, should be disclosed. The material fact remains, therefore labeling should remain. Consumer acceptability, storage qualities and nutrients are effected. Some irradiated foods have different texture and spoilage characteristics from untreated foods. Most fruits and vegetables have nutrient losses that are not obvious or expected by the consumer.

In addition, processing by irradiation causes chemical changes that are not evident and are potentially hazardous. Meat may have a higher level of carcinogenic benzene. All irradiated foods contain unique radiolytic products that have never been tested.

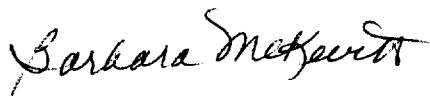
Whether or not the FDA has approved irradiation as safe, it remains a new technology with no long-term human feeding studies. Consumers have a right to know if this process has been used on their food.

As to the kind of label used, I believe that label should be large enough to be readily visible to the consumer, and displayed prominently on the front of the package. The label contains important information regarding processing of the contents. For displayed whole foods like produce, a prominent informational display similar to that used for meats should be used but, containing the term irradiation and the radura symbol.

Because of the newness of the technology and the need to assess the public health effects of widespread use of irradiated foods, I believe that the labeling requirement should not be permitted to expire.

We, the consumers/eaters, have a right accurate and complete information about the foods we are putting into our bodies.

Sincerely,

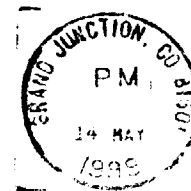


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